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Attorneys for Defendant and Counterclaimant
KOCHAVA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LIVERAMP, INC., a Delaware Corporation,
Plaintiff,
vs.
KOCHAVA, INC., a Delaware Corporation,
Defendant.

CASE NO.: 3:19-cv-02158-CRB

Judge: Honorable Charles R. Breyer

VS.

**STIPULATED REQUEST TO EXTEND
CASE SCHEDULE; ~~[PROPOSED]~~
ORDER**

KOCHAVA, INC., a Delaware Corporation,)
)
Defendant.)

KOCHAVA, INC., a Delaware Corporation,)
)
Counterclaimant,)

VS.

LIVERAMP, INC., a Delaware Corporation,)
)
Counter-Defendant.)

1 TO THIS HONORABLE COURT:

2 Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, Plaintiff and Counter-Defendant
3 LiveRamp, Inc. (“LiveRamp”) and Defendant and Counterclaimant Kochava, Inc. (“Kochava”)
4 (collectively, the “Parties”) respectfully submit this stipulated request to extend the case schedule
5 in this matter by ninety (90) days for good cause. The Parties seek the requested extensions due
6 to ongoing settlement discussions, as further explained below.

7 WHEREAS, the Parties submitted a Joint Case Management Conference Statement on
8 February 7, 2020, with an agreed case schedule (Dkt. 71);

9 WHEREAS, the Court adopted the agreed case schedule contained in the Joint Case
10 Management Conference Statement on February 14, 2020 (Dkt. 73);

11 WHEREAS the Parties previously stipulated to extend the case schedule due to the
12 unavailability of in-person depositions caused by the current COVID-19 pandemic (Dkt. 90);

13 WHEREAS this Court granted the prior stipulation to extend the case schedule (Dkt. 91);

14 WHEREAS discovery has been significantly delayed and hampered due to the COVID-
15 19 pandemic, inclusive of the lack of availability of witnesses, among other concerns; stemming
16 partially from such issues, the Parties have been engaged in significant late stage settlement
17 discussions wherein the Parties have, in their view appropriately, expended resources toward
18 resolution in lieu of expenditures of the significant time and expense discovery in this case will
19 further entail;

20 WHEREAS a proposed settlement agreement has been exchanged, and is currently under
21 review with Plaintiff;

22 NOW THEREFORE, the Parties hereby STIPULATE and AGREE to continue the
23 current case schedule by approximately ninety (90) days, as follows:
24
25
26
27

| EVENT | CURRENT DEADLINE/DATE | STIPULATED DEADLINE/DATE |
|--|--------------------------|---|
| Cutoff to Serve Written Fact Discovery | April 14, 2021 | July 13, 2021 |
| Exchange of Expert Reports | June 14, 2021 | September 13, 2021 |
| Rebuttal Expert Reports | July 14, 2021 | October 12, 2021 |
| Close of Discovery | August 17, 2021 | November 15, 2021 |
| Deadline for Filing Dispositive and Daubert Motions | September 14, 2021 | December 13, 2021 |
| Status Conference by Zoom | December 11, 2020 | March 11, 2021 March 12, 2021 |
| Joint Status Report Due | December 4, 2020 | March 4, 2021 |

IT IS SO STIPULATED.

Respectfully submitted,

Dated: November 9, 2020

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Craig J. Mariam
Craig J. Mariam
Hazel Mae B. Pangan
Samuel B. Laughlin
Attorneys for Defendant and
Counterclaimant KOCHAVA, INC.

1 Dated: November 6, 2020

WILSON SONSINI GOODRICH & ROSATI, P

2
3 By: /s/ Shelby Pasarell Tsai
Tonia Ouellette Klausner
4 Shelby Pasarell Tsai
Attorneys for Plaintiff and Counter-
5 Defendant LIVERAMP, INC.


6 **ATTESTATION**

7 I hereby attest that the other signatories listed, on whose behalf the filing of this
8 stipulation is submitted, concur in the filing's content and have authorized the filing.

9
10 /s/ Craig J. Mariam
11 Craig J. Mariam

~~PROPOSED~~ ORDER**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

| EVENT | CURRENT DEADLINE/DATE | STIPULATED DEADLINE/DATE |
|--|----------------------------------|-------------------------------------|
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| Joint Status Report Due | December 4, 2020 | March 4, 2021 |

Dated: November 10, 2020


 Honorable Charles R. Breyer
 UNITED STATES DISTRICT JUDGE